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Hon. Stewart D. Aaron
U.S. Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application GRANTED. SO ORDERED.

Dated: December 3, 2021

Att'd a

Re: Wolper v. Commissioner of Social Security
Docket No: 1:21-cv-03582-VSB-SDA

Dear Judge Aaron,

This letter respectfully requests an extension of time of 62 Days for Plaintiff to file their motion for Judgment on the Pleadings in this matter. Plaintiff's Brief is currently due on December 7, 2021, however, Plaintiff cannot complete the Brief on time.

The Defendant was unable to produce CARs during the early stage of the pandemic. Now the Defendant is producing 700 CARs a week and has served over a years' worth of transcripts in a very short period of time. As a result, Plaintiff's counsel has multiple simultaneous filing deadlines that cannot be met.

Plaintiff's counsel has contacted defense counsel who has consented to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on February 7, 2022. The Commissioner's response would be due 60 days thereafter.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Mary Brennan, Counsel for Defendant